



Danae Tinelli
4530 Wisconsin Ave, NW, Suite 5
Washington, DC 20016
Tel. 202.851.4070
Danae@oandzlaw.com

October 30, 2023

VIA ECF

The Honorable Paul A. Crotty
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 14C
New York, NY 10007

**Re: *Pearson Education, Inc. et al. v. Khaled Hasan et al.*
S.D.N.Y. Case No. 23-cv-07284-PAC**

Dear Judge Crotty:

We represent Plaintiffs in the above-referenced action. We write to seek leave to re-file the First Amended Complaint (Dkt No. 66) with a corrected case caption and corrected list of Defendants on page 2 ("Corrected First Amended Complaint"). The caption and page 2 of the First Amended Complaint inadvertently omit the names of four Defendants: Anindita Mahanta, Mohd Kashif Rashid, Saman Naaz, and Zyus eRetail Private Limited. However, each of these Defendants is identified as a "Defendant" in the "Parties" section of the Amended Complaint, where Plaintiffs included specific allegations regarding them. *See* First Am. Compl. ¶¶ 48-51. They are also identified in the exhibits to the Amended Complaint. *See* Exs. D and E. The Corrected First Amended Complaint does not include any other changes.

Upon realizing this oversight, Plaintiffs promptly conferred with the Court's ECF Helpdesk and ECF Quality Assurance team, who advised us that, in order to make these corrections, Plaintiffs must seek leave from Your Honor. Accordingly, we ask the Court for leave to file the Corrected First Amended Complaint (attached hereto as Exhibit 1).

Thank you for the Court's consideration of this request.

Sincerely,

/s/ Danae Tinelli

Danae Tinelli

Counsel for Plaintiffs

The requested leave is granted.
SO ORDERED.

A handwritten signature in black ink, appearing to read 'Paul A. Crotty'.

03115 11-1-23